

EXHIBIT 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al.,
Plaintiffs,

v.

Case No.

GOOGLE LLC,

20-cv-04688-RS

Defendant.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
ZOOM VIDEOTAPED DEPOSITION OF DAVID MONSEES

Thursday, September 15, 2022

9:00 a.m. PST

TAKEN BY:

MARK MAO, ESQ.

ATTORNEY FOR PLAINTIFF

REPORTED BY:

BELLE VIVIENNE, RPR, CRR, NJ-CRR,
WA/CO/NM-CCR

NATIONALLY CERTIFIED REALTIME
COURT REPORTER

VERITEXT LEGAL SOLUTIONS

JOB NO. 5431690

866.299.5127

1 disagree with any of the -- the slides 05:50:19
2 that you put together in this 05:50:22
3 presentation? 05:50:23
4 MR. SANTACANA: Objection, 05:50:26
5 vague, compound. 05:50:28
6 A. I think that would be a 05:50:31
7 difficult question for me to answer in 05:50:33
8 general. Is there a specific slide that 05:50:35
9 you would like to discuss? 05:50:37
10 BY MR. MAO: 05:50:37
11 Q. Let me drop back a moment for 05:50:39
12 our -- for a moment here. How does 05:50:42
13 Enterprise WAA setting differ from 05:50:47
14 consumer WAA setting? 05:50:49
15 A. Sure, for Enterprise customers 05:50:50
16 as I mentioned in my previous statement, 05:50:52
17 both the end user and the Enterprise 05:50:54
18 customer, what these slides likely refer 05:50:57
19 to as the admin or administrator both have 05:51:00
20 a control for the Web and App Activity 05:51:03
21 setting and by default, the Web and App 05:51:05
22 Activity setting was off for all 05:51:09
23 domains -- sorry, for all Enterprise 05:51:12
24 domains for a period of time and then it's 05:51:14
25 also disabled for certain other -- I -- I 05:51:19

1 think they call it SKUs, differences 05:51:22
2 between paying tiers of these Enterprise 05:51:25
3 accounts. What this deck is trying to 05:51:29
4 explain is that -- sorry, I should also 05:51:34
5 clarify the Web and App Activity setting 05:51:37
6 is also off for all Enterprise user 05:51:38
7 accounts. As it creates a scenario where 05:51:40
8 both the admin and the user must 05:51:44
9 coordinate enabling the setting to benefit 05:51:48
10 from some of the features that I believe 05:51:51
11 this deck explains that are disabled in 05:51:53
12 these Google Workspaces products 05:51:57
13 specifically is what this deck focuses on. 05:51:59
14 Q. Is there -- are there settings 05:52:05
15 or records that show whether any 05:52:08
16 particular Google account is a Enterprise 05:52:10
17 account or a regular end-user consumer 05:52:14
18 account? 05:52:18
19 A. Yes, there are -- I'm not sure 05:52:19
20 of all the -- the places that this 05:52:25
21 information might reside, but in the core 05:52:27
22 Google account repository where account 05:52:31
23 information is stored, my understanding is 05:52:34
24 that that denotes if an account is a 05:52:35
25 Enterprise account or not. 05:52:38

CERTIFICATION

I, BELLE VIVIENNE, a Nationally
Certified Realtime Reporter, do hereby
certify:

That the witness whose testimony as
herein set forth, was duly sworn by me;
and that the within transcript is a true
record of the testimony given by said
witness.

I further certify that I am not
related to any of the parties to this
action by blood or marriage, and that I am
in no way interested in the outcome of
this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 20th day of September
2022.

Belle Vivienne

BELLE VIVIENNE, CRR, CCR, RPR

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